

**Fill in this information to identify the case:**

Debtor 1 Veronica Louise Hill

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 20-21541 CMB

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of Creditor: PNC BANK, NATIONAL ASSOCIATION Court claim no. (if known): 8

Last 4 digits of any number you use to identify the debtor's account: 1745

Property address:

1077 Flatwoods Road  
Vanderbilt, PA 15486

#### Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

#### Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08 / 01 / 2024 as of the handoff from trustee. Loan is currently due for 8/1/24 - 2/1/25

—

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- |  |                |
|--|----------------|
| a. Total postpetition ongoing payments due:                      | (a) \$ _____   |
| b. Total fees, charges, expenses, escrow, and costs outstanding: | + (b) \$ _____ |
| c. <b>Total.</b> Add lines a and b.                              | (c) \$ _____   |

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Veronica Louise Hill  
First Name Middle Name Last Name

Case Number (if known): 20-21541 CMB

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

Brent J. Lemon  
x/s/

Date 02/17/2025

Brent Lemon  
17 Feb 2025, 10:32:08, EST

KML Law Group, P.C.  
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Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Veronica Louise Hill**

**Debtor(s)**

**PNC BANK, NATIONAL  
ASSOCIATION**

**Movant**

**vs.**

**Veronica Louise Hill**

**Debtor(s)**

**Ronda J. Winnecour,**

**Trustee**

**BK NO. 20-21541 CMB**

**Chapter 13**

**Related to Claim No. 8**

**CERTIFICATE OF SERVICE**

**RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on February 20, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

**Debtor(s)**

Veronica Louise Hill  
1077 Flatwoods Road  
Vanderbilt, PA 15486

**Attorneys for Debtor(s) (via ECF)**

Andrew K Pratt  
Calaiaro Valencik  
555 Grant Street  
Suite 300  
Pittsburgh, PA 15219

**Trustee (via ECF)**

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

David Z. Valencik  
Calaiaro Valencik  
555 Grant Street  
Suite 300  
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: February 20, 2025

**/s/ Brent J. Lemon**

Brent J. Lemon  
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